

MOBILE CONNECTIONS

"YOUR CONNECTION TO MOBILE PEOPLE"

Jeffrey C. Berman
President

1362 Haddon Road
Columbus, Ohio 43209

June 4, 1992

VIA OVERNIGHT DELIVERY

Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: CC Docket No. 92-105

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FCC MAIL BRANCH
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Dear Sir or Madam:

JUN - 5 1992

Enclosed please find an original and five copies of the Comments of Mobile Connections, Inc. in the above-referenced matter. Please file the original and four copies and return a file-stamped copy to me in the enclosed postage pre-paid envelope.

Thank you very much for your assistance. If you have any questions, please do not hesitate to contact me at my daytime telephone number (614) 227-1961.

Sincerely,



Jeffrey C. Berman
President

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUN 5 1992

FCC MAIL BRANCH

In the Matter Of:

CC Docket No. 92-105

The Use of N11 Codes and Other
Abbreviated Dialing Arrangements

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COMMENTS OF MOBILE CONNECTIONS, INC.

Federal Communications Commission
Office of the Secretary

Mobile Connections, Inc. ("Mobile") respectfully submits the following comments pursuant to Sections 1.415 and 1.419 of the Federal Communications Commission's ("Commission") Rules, 47 C.F.R. § 1.415, 1.419.

INTRODUCTION

Mobile is an enhanced service provider, duly incorporated to do business in the State of Ohio, whose principal place of business is 1362 Haddon Road, Columbus, Ohio, 43209.

On or before May 24, 1991, Mobile initiated discussions with Cincinnati Bell Telephone Company ("CBT") regarding, among other things, the assignment to Mobile of a three-digit dialing code for access by CBT's customers to Mobile's proposed enhanced service offering, which is informational in nature. (Insofar as Mobile's proposed enhanced service offering involves proprietary information, the exact nature of the service cannot be disclosed at this time.) While CBT was in agreement that a three-digit access code would be highly

appropriate for Mobile's intended service, CBT was not able to assign such a code. Although Mobile and CBT have continued their discussions in an effort to determine an alternative dialing methodology that would be otherwise advantageous to Mobile's customers, use of a three-digit code in this particular instance would not only be desirable, but preferable.

As a result of this dialing dilemma, Mobile has not as yet been able to initiate service in the Cincinnati area or in any other market. It is the intention of Mobile to become an enhanced service provider on a national level.

COMMENTS

1. With respect to paragraph 11 of the Commission's Notice of Proposed Rulemaking ("Notice"), it is Mobile's position that the use of the 411 code should be restricted to the provision of directory assistance information that is classified as basic or adjunct to basic for the following reasons:

- A) Use of 411, now prevalent in a large portion of the country as directory assistance that is basic or adjunct to basic service by local exchange companies ("LECs"), for services other than directory assistance will cause a great deal of customer confusion in the future.
- B) Use of 411 exclusively for directory assistance will promote nationwide homogeneity and uniformity among numbering systems that the Commission and the North American Numbering Plan should ultimately strive for. This will also increase customer understanding, acceptance and use of 411 as the "official" directory assistance number.

- C) Uniform assignment of 411 to LECs' directory assistance will benefit Mobile. As previously stated, it is Mobile's intention to become an enhanced service provider on the national level. Mobile will benefit from a uniform three-digit code assignment in much the same way the exclusive assignment of 411 will benefit directory assistance.

2. With respect to paragraph 12 of the Commission's Notice, it is the position of Mobile that 611 and 811 should be made available to enhanced service providers for abbreviated dialing and that the use of those two codes by LECs for repair services and business offices services is not an efficient use of the limited numbering resources which serve an important public service for the following reasons:

- A) It is anticipated that a great number of enhanced service providers would like to have a three-digit code assigned to their service; therefore, with more three-digit codes available from the LECs, more information service enterprises would have the opportunity to utilize this convenient method of better serving their customers.
- B) It does not appear critical that LECs retain the ability to assign three-digit codes for repair services since this is not a standard LEC practice around the country. LECs could simply assign seven-digit codes for repair services, which would not be a hardship for the LECs' customers who presumably do not make such calls on a daily or routine basis.
- C) Similarly, it does not appear vital for LECs to continue to be able to assign three-digit codes for their business office services. Since this is not a very widespread practice among LECs, and due to the non-routine nature of such calling, better utilization of these finite calling codes could be made through assignment for more universal purposes.

3. With respect to paragraph 13 of the Commission's Notice, Mobile appreciates the limited numbering resources

presently available and would abide by the Commission's ruling as to the issue of recalling of three-digit codes for use as area codes. However, Mobile would like the notice period to be long enough (e.g. six months seems to be the bare minimum in this circumstance) to allow the service providers utilizing those recalled three-digit codes sufficient time to establish a new dialing assignment and to notify all customers, including potential customers.

4. With respect to paragraph 14 of the Commission's Notice, it is Mobile's position that the assignment of three-digit codes should be limited to enhanced service providers, who provide emergency services and unique types of information service offerings (such as 911 and 411). Other less exigent or niche-market service providers should be assigned other (1-900 or 1-976) dialing codes.

5. With respect to paragraph 15 of the Commission's Notice, it is Mobile's position that holders of three-digit codes wishing to sell or transfer a three-digit code should be required to obtain approval from at least the LEC and possibly from either the State public utility commission or the FCC, depending on the jurisdictional nature of the service. This would prevent hoarding of such a number with no apparent intent except for mere investment purposes. This type of process, which would involve the regulatory community, would also insure that the service provider utilizing such a three-digit code would offer a useful and beneficial service to the LECs' customers.

6. With respect to paragraph 16 of the Commission's Notice, it is Mobile's position that holders of three-digit codes should be limited to a specific number of these codes by individual LECs. Realizing that there will be only four or six three-digit codes available in each geographic area, each holder should be limited to only one set of these codes. It is also Mobile's position that LECs should have the discretion to grant a preference to entities that propose innovative ways of using the company's network, as well as providing a service that is deemed to be in the broad public interest. Mobile considers its proposed service to be both innovative and useful to the public at large. With respect to the remaining issues of paragraph 16 of the Commission's Notice, Mobile is unable to provide comment.

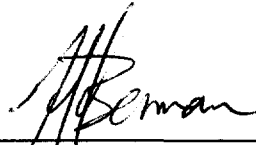
7. With respect to paragraph 17 of the Commission's Notice, it is Mobile's position that regulatory oversight or involvement will be necessary for the fair and proper allocation of the limited number of available N11 codes. Mobile cannot offer comments as to what specific role each regulatory agency should have at this point in time.

8. With respect to paragraph 18 of the Commission's Notice, Mobile agrees that dialing schemes of differing lengths can cause customer confusion. Mobile also agrees that the use of N11 codes for information services will not result in customer confusion. (Please see comments in paragraph 1 above.)

9. With respect to paragraph 19 of the Commission's Notice, it is Mobile's position that the assignment of a three-digit code would be the most advantageous for Mobile's purposes; however, other abbreviated dialing arrangements that could be made available in lieu of N11 codes would be acceptable to Mobile.

Mobile reserves the right to amend its comments and to file a reply in this docket.

Respectfully submitted,



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